

*Attorneys for Defendants Matthew Maddox and
Patricia Mulroy*

DISTRICT OF NEVADA

The Honorable Kent J. Dawson

STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE TO RESPOND TO COMPLAINT

Defendants.

**STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE TO RESPOND
TO COMPLAINT**

1 **STIPULATION**

2 **WHEREAS**, on March 25, 2019, Dustin Gaj (“Plaintiff”) filed a shareholder derivative
3 complaint, *Gaj v. Stephen A. Wynn, et al.*, Case No. 2:19-cv-00505-KJD-CWH (D. Nev.) against
4 Stephen A. Wynn, Matthew Maddox, Kimmarie Sinatra, D. Boone Wayson, Alvin V. Shoemaker, John
5 J. Hagenbuch, Robert J. Miller, Ray R. Irani, Patricia Mulroy, Clark T. Randt, Jr., Jay L. Johnson, Marc
6 D. Schorr, J. Edward Virtue, Stephen Cootey, and Craig S. Billings, also naming Wynn Resorts, Ltd. as
7 a nominal defendant (the “Complaint”);

8 **WHEREAS**, on March 27, 2019, Defendant Matthew Maddox accepted service of the
9 Complaint;

10 **WHEREAS**, Defendant Matthew Maddox’s deadline to move to dismiss the Complaint, or, in
11 the alternative, answer the Complaint, is on April 17, 2019;

12 **WHEREAS**, on March 30, 2019, Defendant Patricia Mulroy accepted service of the Complaint;

13 **WHEREAS**, Defendant Patricia Mulroy’s deadline to move to dismiss the Complaint, or, in the
14 alternative, answer the Complaint, is on April 20, 2019;

15 **WHEREAS** Defendants intend to move to dismiss the Complaint, including on the grounds that
16 the named Defendants exercised their business judgment in considering Plaintiff’s demand, and for
17 failure to state a claim;

18 **WHEREAS**, Plaintiff and Defendants Matthew Maddox and Patricia Mulroy agree that
19 litigating piecemeal motions to dismiss the Complaint is not in the interest of judicial economy, and thus
20 that litigating a single response to the Complaint would inure to the benefit of the parties and the Court.

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NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

1. Defendants Matthew Maddox and Patricia Mulory's deadlines to respond to the Complaint shall be extended to June 10, 2019.

ALDRICH LAW FIRM LTD.

By: /s/ John P. Aldrich

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Attorneys for Defendants Matt Maddox and Patricia Mulroy

IT IS SO ORDERED.

Dated: This 23 Day of April, 2019


United States Magistrate Judge

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE TO RESPOND TO COMPLAINT** by method indicated below:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below and addressed to the following:

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Date: April 17, 2019

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.